

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARGETTA LANGLOIS,

Pro Se Plaintiff,

v.

SAMUEL POLLACK,
MICHAEL HUGO,
ALBERT FLANDERS

Defendants.

CIVIL ACTION: 04-CV11588

AFFIDAVIT OF SAMUEL M. POLLACK

I, Samuel M. Pollack, being duly sworn, depose and state that I am an attorney admitted to practice before the Courts of the Commonwealth of Massachusetts, and have personal knowledge of the facts set forth herein.

1. On January 6, 2005, I contacted the Plaintiff, Margetta Langlois, in order to discuss the taking of her deposition as well as other unresolved discovery matters.
2. During the course of my conversation with the Plaintiff, she asserted that there was "no way" she will have her deposition taken.
3. I am aware that Margetta Langlois is Pro Se in this matter, and I made special effort to explain to her that the Federal Rules of Civil Procedure, allow me the opportunity to take her deposition and therefore she is obligated to submit to this process. I further explained to Ms. Langlois that if she refused to be deposed, I

would have to file a motion with the court and I would request any costs associated with this process.

4. The Plaintiff, Margetta Langlois reiterated that she will not allow me an opportunity to take her deposition.

Signed under the pains and penalties of perjury the 7th day of January, 2005.



Samuel M. Pollack